

UNITED STATES DISTRICT COURT  
DISTRICT OF NEW JERSEY  
CAMDEN VICINAGE

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SENTINEL INSURANCE COMPANY, LTD.,

Plaintiff,

-vs-

CONRAD J. BENEDETTO, individually and doing  
business as THE LAW OFFICES OF CONRAD J.  
BENEDETTO, and JOHN GROFF,

Defendants.

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CONRAD J. BENEDETTO, THE LAW  
OFFICES OF CONRAD J. BENEDETTO, and  
JOHN GROFF,

Plaintiffs,

-vs-

SENTINEL INSURANCE COMPANY, LTD.,  
JOHN DOES and ABC ENTITIES A-Z,

Defendants.

Civil Action No. 19-cv-20142-RMB-AMD

Motion Return Date: September 8, 2020

[Document Electronically Filed]

**NOTICE OF MOTION  
FOR SUMMARY JUDGMENT**

Motion By:	Plaintiff Sentinel Insurance Company, Ltd. ("Sentinel")
Motion Returnable:	September 8, 2020, Mitchell H. Cohen Building & U.S. Courthouse, 4th & Cooper Streets, Camden, NJ 08101
Supporting Papers:	Sentinel's Statement of Material Facts Pursuant to Local Rule 56.1(a) in Support of its Motion for Summary Judgment  Declaration of Patrick D. Bonner Jr. with supporting Exhibits A through G  Declaration of Laianna C. Hartley with supporting Exhibits A through G

Memorandum of Law in Support of Sentinel's Motion for  
Summary Judgment Pursuant to Federal Rule of Procedure 56

Proposed Order

Relief Sought: An Order granting summary judgment in favor of Sentinel, declaring that Sentinel has no duty to defend or indemnify Conrad J. Benedetto, The Law Offices of Conrad J. Benedetto, and John Groff in connection with two underlying employment-related discrimination lawsuits filed in the Superior Court of the State of New Jersey, and granting summary judgment dismissing the Complaint of Conrad J. Benedetto, The Law Offices of Conrad J. Benedetto and John Groff against Sentinel in the consolidated action with prejudice.

Oral Argument: Oral Argument is respectfully requested

PLEASE TAKE FURTHER NOTICE that opposition papers, if any, shall be filed with the Clerk and served upon counsel for Sentinel not less than fourteen (14) days prior to the return date and that failure to file opposition papers may be deemed by the Court as consent to the granting of the motion.

PLEASE TAKE FURTHER NOTICE that Sentinel intends to file and serve reply papers.

Dated: White Plains, New York  
August 7, 2020

MENZ BONNER KOMAR & KOENIGSBERG LLP

By: /s/ Patrick D. Bonner  
Patrick D. Bonner, Jr.  
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*Attorneys for Plaintiff Sentinel Insurance Company, Ltd.*

Defendants' counsel served via ECF:

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*Counsel for John Groff*